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*Great-West Life & Annuity Insurance Company  
and Mediversal, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

GREAT-WEST LIFE & ANNUITY  
INSURANCE COMPANY, and  
MEDIVERSAL, INC.

Plaintiff,

vs.

AMERICAN ECONOMY INSURANCE  
COMPANY and COLORADO  
CASUALTY,

Defendants.

CASE NO: 2:11-cv-02082-KJD-CWH

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO FILE  
ANSWER TO DEFENDANTS AMERICAN  
ECONOMY INSURANCE COMPANY'S  
AND COLORADO CASUALTY'S  
COUNTERCLAIM AND ORDER**

**[FIRST REQUEST]**

Plaintiffs Great-West Life & Annuity Insurance Company ("Great-West"), and  
Mediversal, Inc. ("Mediversal"), by and through their counsel, submit the following Unopposed

1 Motion for Enlargement of Time to File Answer To Defendants American Economy Insurance  
2 Company's and Colorado Casualty's Counterclaim. As grounds, Great-West and Mediversal  
3 state as follows:<sup>1</sup>

4 1. On December 23, 2011, Great-West filed its Complaint in this matter. (Doc. 1.)

5 2. On January 26, 2012, this Court granted the Stipulation and Order for Extension  
6 of Time for Defendant to Respond to Plaintiff's Complaint and for Plaintiff to File an Amended  
7 Complaint. (Doc. 5.)

8 3. On February 27, 2012, Great-West and Mediversal filed their Amended  
9 Complaint and Jury Demand. (Doc. 13.)

10 4. On March 19, 2012 Defendants filed Defendants American Economy Insurance  
11 Company and Colorado Casualty's Answer to Amended Complaint and Jury Demand; and  
12 Counterclaim ("Defendants' Answer and Counterclaim"). (Doc. 16.)

13 5. After the filing of Defendants' Answer and Counterclaim, counsel for the Parties  
14 discussed the elimination of certain issues in this matter, and are considering options to amend  
15 the pleadings or to enter into possible stipulations to narrow the scope of the claims and defenses  
16 in this action. A small amount of additional time is required for counsel to confer with their  
17 clients and attempt to reach an agreement that would eliminate certain issues or allegations.

18 6. Plaintiffs' Answer to Defendants' Answer and Counterclaim is due to be filed  
19 today, April 12, 2012. Plaintiffs' reaction to Defendants' Answer and Counterclaim is likely to  
20 be affected by the ongoing discussions pertaining to the elimination of certain issues or  
21 allegations in this action.

22 7. Accordingly, Plaintiffs request a seven-day enlargement of the time in which to  
23 file their Answer to Defendants' Answer and Counterclaim, up to and including April 19, 2012.

24 8. Defendants have informed Plaintiffs that they do not oppose the relief requested  
25 herein.

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28 <sup>1</sup> Great-West and Mediversal certify they have conferred in good faith with counsel for Defendants regarding the relief requested herein. Defendants do not oppose the relief requested.

1           9.       Prior to this request, the Parties have stipulated to and requested one prior  
2 enlargement of time for filing an amended complaint, as granted by this Court's January 26,  
3 2012 Order, but there have been no prior requests for any extension of the instant deadline to  
4 answer the Counterclaim.

5           WHEREFORE, Great-West Life & Annuity Insurance Company and Mediversal, Inc.  
6 request the Court grant this Motion for Enlargement of Time to File Answer to Defendants  
7 Answer and Counterclaim; enlarge the deadline by which Great-West and Mediversal must file  
8 their Answer to Defendants' Counterclaim up to and including April 19, 2012; and for such other  
9 and further relief as this Court deems proper.

10  
11           Dated: April 12, 2012

Respectfully submitted,

12           LEWIS AND ROCA LLP

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14           By /s/ Lindsay Demaree

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20           Attorneys for Plaintiff  
21           Great-West Life & Annuity Insurance Company  
and Mediversal, Inc.

22  
23           IT IS SO ORDERED:

24  
25             
UNITED STATES MAGISTRATE JUDGE

26  
27           DATED: April 13, 2012

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of LEWIS AND ROCA LLP and that on the 12th day of April 2012, a true and correct copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE ANSWER TO DEFENDANTS AMERICAN ECONOMY INSURANCE COMPANY AND COLORADO CASUALTY'S COUNTERCLAIM** was served on the parties to this case through electronic transmission of the Notice of Electronic Filing, which constitutes service of a document on Filing Users under the Court's Electronic Filing Procedures to all parties to this case who are Filing Users of the Electronic Filing System of the United States District Court for the District of Nevada.

/s/   
An Employee of Lewis and Roca LLP